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*Attorneys for Defendant Corea Autoparts
Producing Corporation d/b/a CAP America*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ROBERT BOSCH LLC,
Plaintiff

v.

COREA AUTOPARTS PRODUCING
CORPORATION d/b/a CAP AMERICA,
Defendant.

Case No. 2:10-cv-01924-RJH-RJJ

MOTION TO COMPEL DISCOVERY

[EXPEDITED RELIEF REQUESTED]

Defendant (“CAP America”) moves to compel discovery from plaintiff (“Bosch LLC”).

More specifically, CAP America requests this Court to order the following:

1. Bosch LLC to produce all requested documents and information in the possession of Robert Bosch GmbH;

2. Bosch LLC to identify documents responsive to each of CAP America's production requests;

3. Bosch LLC to provide its doctrine of equivalents infringement position in response to Interrogatory No. 1;

4. Bosch LLC to respond fully to Interrogatory Nos. 3-5, 8 and 9; and

5. Bosch LLC to specify the Rule 33(d) records being relied upon in response to Interrogatory No. 6.

In making this motion, CAP America relies upon the accompanying brief.

Prior to filing this motion, and pursuant to L.R. 26-7, counsel for both CAP America and Bosch LLC communicated by telephone conference and correspondence in an effort to resolve the discovery issues raised by CAP America's counsel. (See Exhibits 1-3 cited in accompanying brief.) Despite these communications, and a sincere effort to resolve any differences, the parties could not resolve their all the discovery issues that are now the issues of the present motion.

Dated: May 11, 2011

Respectfully submitted,

By: /s/ Marc Lorelli
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CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that on May 11, 2011, I electronically filed the foregoing document with the Clerk of the Court for the District of Nevada using the ECF System which will send notification to the following registered participants of the ECF System as listed on the Court's Notice of Electronic Filing: Jennifer L. Braster, Mark A. Cantor, Vincent C. Ferenbach, Jeffrey S. Ginsberg, Gary R. Goodheart, Mark Hannemann, Michael J. Lennon, Marc Lorelli, Robert S. Roe.

I also certify that I have mailed by United States Postal Service the paper to the following non-participants in the ECF System: None.

I certify that I have mailed by United States Postal Service the documents to be filed Under Seal to the attorneys of record.

By: /s/ Marc Lorelli
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